

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS**

MARIAN DINEEN,)	
Plaintiff,)	
Vs.)	Case No. 16-7015
EARL OLIVER and)	
DAKOTA LINES, INC.,)	
Defendants.)	

COMPLAINT

Now comes the Plaintiff, MARIAN DINEEN, by her attorneys, John Shea Coghlan and Marek, Meyer and Coghlan, Ltd. and complaining against the Defendants, EARL OLIVER and DAKOTA LINES, INC., states as follows:

1. That Plaintiff, Marian Dineen is a resident and citizen of the State of Illinois.
2. That Defendant, Earl Oliver, is a resident and citizen of the State of Michigan, doing business in the States of Michigan, Illinois and Indiana.
3. That Defendant, Dakota Lines, Inc. is a corporation doing business in the States of Illinois, Michigan and Indiana.
4. That Federal jurisdiction is based upon the diversity of citizenship as Plaintiff is a resident of Illinois, Defendant, Earl Oliver is a resident of the State of Michigan and Defendant, Dakota Lines, Inc. is a Michigan corporation and an amount in controversy over Seventy-Five Thousand (\$75,000.00) Dollars.
5. That Plaintiff, Marian Dineen seeks damages in an amount of One Hundred Fifty Thousand (\$150,000.00) Dollars.
6. That on July 7, 2014 Plaintiff, Marian Dineen was operating a certain motor vehicle in a generally easterly direction on Interstate I-94 at or about the 19.0 mile marker in the State of Illinois.

7. That on July 7, 2014 Defendant, Earl Oliver was operating a certain motor vehicle in a generally easterly direction on Interstate I-94 at or about the 19.0 mile marker in the State of Illinois.
8. That at all times herein Defendant, Earl Oliver was an agent of Defendant, Dakota Lines, Inc.
9. That at said time and place Plaintiff, Marian Dineen was forced to stop her motor vehicle due to the sudden stop of a vehicle immediately in front of her said vehicle.
10. That at said time and place the motor vehicle operated by Defendant, Earl Oliver, for the benefit of Defendant, Dakota Lines, Inc. struck Plaintiff, Marian Dineen's motor vehicle.
11. That at said time and place Defendant, Earl Oliver and Defendant, Dakota Lines, Inc. were guilty of one or more of the following careless and negligent and wrongful acts.
 - (a) Following too closely
 - (b) Operating a motor vehicle too fast for conditions.
 - (c) Failing to keep a proper lookout for other vehicles.
 - (d) Otherwise carelessly, negligently and wrongfully operating said motor vehicle.
12. That as a direct and proximate result of said careless, negligent and wrongful action by Defendants, Plaintiff, Marian Dineen suffered injuries to her head, neck, back, legs and spine; that she was unable to attend to her usual occupation and that she incurred damages of lost time from work, medical expenses and ongoing pain and suffering.

13. That Plaintiff, Marian Dineen seeks damages against Defendants, Earl Oliver and Dakota Lines, Inc. in an amount of One Hundred Fifty Thousand (\$150,000.00) Dollars plus costs of this suit.

WHEREFORE, Plaintiff, Marian Dineen, prays for judgment against the Defendants, Earl Oliver and Dakota Lines, Inc. in the amount of One Hundred Fifty Thousand (\$150,000.00) Dollars plus costs of suit.

Respectfully submitted,

Marian Dineen, Plaintiff

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